

Comments on RM-11306

(Communications Think Tank's "Petition For Spectrum Deregulation in the Amateur Service")

Thank you for the opportunity to comment on this proposal. I believe that the petitioner's fundamental justifications, such as that the HF, or Shortwave, bands favor voice are patently false. If adopted it would result in extreme interference between incompatible narrow and wide modes of operation.

If the survey had been conducted over many years, at least over a full sun spot 11-year cycle, and took in to account different types of short-term activity then the study would not support the proposed changes.

Even if the FCC adopted management rules that, similar to those in Canada, simply stated a maximum bandwidth for the band I would expect that the voluntary band plan would not allow SSB, other voice modes, or wideband digital modes over the full spectrum of every band as proposed by the petitioners.

I believe that the vast majority of licensed amateur radio operators do have good judgment and do typify the best of ham radio ideals. However only a few amateurs can totally disrupt the bands if they do not have good judgment, for example in setting up automatic stations in the area traditionally used by amateurs to operate CW DX.

The petitioners state that communications technology exists today offers interference protection that was not conceived of 60 years ago. However having a full power semi-automatic station come up on top of low power narrow band modes such as QRP CW or PSK31 leaves the low power operator no choice but to cease operation in the face of the interference. Regardless of what the petitioners believe, there are still incompatible modes that need to be protected.

This petition is ill advised and should be rejected in total.

Regards,

Thomas G. Azlin, N4ZPT
411 Center Street North
Vienna, Virginia 22180
USA